

REMARKS

Claims 1-54 were presented for examination and all claims were rejected. In the present amendment, claim 29 has been amended to address issues with antecedent basis. No new matter has been introduced. Upon entry of the present amendment, claims 1-54 will be currently pending in this application, of which claims 1, 20, 38, 44 and 51-54 are independent. Applicant submits that claims 1-54 are in condition for allowance.

The following comments address all stated grounds of rejection. Applicant respectfully traverses all rejections and urge the Examiner to pass the claims to allowance in view of the remarks set forth below.

DRAWING OBJECTIONS

The Examiner objects to the drawings in Fig. 1 because they fail to show necessary textual labels of features or symbols as described in the specification. Applicant has amended the drawings to address the Examiner's comments. In the replacement sheet for Fig. 1, a descriptive textual label for each numbered element in Fig. 1 has been added.

Accordingly, Applicant respectfully requests the Examiner to withdraw the objection to the drawings.

SPECIFICATION OBJECTIONS

I. Abstract

The Examiner objects to the abstract because it does not appear to distinctly point out that which is new in the art to which the invention pertains. Applicant traverses the objection.

Applicant hereby amends the Abstract. No new matter has been introduced. Applicant submits that the abstract as amended is of the proper content of an abstract for a disclosure. Accordingly, Applicant requests the Examiner to withdraw the objection to the specification.

II. Specification

The Examiner objects to the specification as failing to provide proper antecedent basis for the claimed subject matter under 37 CFR 1.75(d)(1) and MPEP § 608.01(o). The Examiner contends that claim 17 contains the limitation of the client application using less than 50 KB of memory that is not mentioned in the specification. Applicant traverses this objection.

Applicant submits that the disclosure of the application provides clear support and antecedent basis for the subject matter in claim 17. Claim 17, as originally filed, recites a system wherein the client application uses less than 50 KB of memory during execution. Support for this claim can be found in at least paragraphs [0004] and [0005] of the specification. Furthermore, in accordance with MPEP 608.01(l), the original claim is part of the disclosure and therefore the disclosure provides support for the claim. Moreover, the “50 KB” reference does not qualify as a term with variable meaning under MPEP 608.01(o). Instead, this reference is a measure of memory size readily understood by one of ordinary skill in the art. For at least the above reasons, Applicant respectfully requests the Examiner to withdraw the objection to the specification.

CLAIM REJECTIONS UNDER 35 U.S.C. §112**III. Claim 29 Rejected Under 35 U.S.C. §112, Second Paragraph**

Claim 29 is rejected under 35 U.S.C. §112 as showing insufficient antecedent basis. The Examiner contends that there is insufficient antecedent basis for the limitation “wherein step (c) comprises” in line 1 of the claim. Applicant has amended claim 29 as dependent on claim 20 to overcome the rejection. Therefore, Applicant respectfully requests the Examiner to withdraw the rejection of claim 29 under 35 U.S.C. §112, second paragraph.

CLAIM REJECTIONS UNDER 35 U.S.C. §102**IV. Claims 1-54 Rejected Under 35 U.S.C. §102**

Claims 1-6, 11, 12, 15, 16, 18, 20-24, 31-47 and 51-54 are rejected under 35 U.S.C. §102(b) as anticipated by U.S. Pub. No. 2001/0047406 to Araujo et al. (“Araujo”). Applicant respectfully traverses this rejection. Claims 1, 20, 38, 44 and 51-54 are independent claims. Claims 2-6, 11, 12, 15, 16 and 18 depend on and incorporate all the patentable subject matter of independent claim 1, claim 21-24 and 31-37 depends on and incorporate all the patentable subject matter of independent claim 20, claims 39-43 depend on and incorporate all the patentable subject matter of independent claim 38, and claims 45-47 depend on and incorporate all the patentable subject matter of independent claim 44. Applicant submits that Araujo fails to disclose each and every element recited in these claims.

A. Claims 1 and 20 Patentably Distinguished over Araujo

Claim 1 is directed to a system and claim 20 is directed to a method. Claim 1 recites receiving from said proxy server static image data representing the screen of graphical display output. Claim 20 recites transmitting to a user device, by the proxy server, static image data

representing at least a portion of the screen of produced graphical user interface data. Araujo fails to disclose each and every element of the claimed invention.

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. Araujo does not disclose receiving from said proxy server static image data representing the screen of graphical display output, or transmitting to a user device, by the proxy server, static image data representing at least a portion of the screen of produced graphical user interface data. The Examiner cites a section of Araujo (paragraph [0120]) that describes a module receiving screen shots in RDP form. However, the RDP protocol does not send static image data but graphical screen commands for rendering. When received at the user device, the rendering commands are then translated into graphics device interface API calls. Instead of receiving static image data, the device of Araujo receives commands for making graphics API calls. Therefore, Araujo fails to disclose receiving from said proxy server static image data representing the screen of graphical display output, or transmitting to a user device, by the proxy server, static image data representing at least a portion of the screen of produced graphical user interface data.

For at least the above-discussed reasons, Araujo fails to disclose each and every element of independent claims 1 and 20. Thus, Applicant submits that claims 1 and 20 are patentable and in condition for allowance. Claims 2-6, 11, 12, 15, 16 and 18 depend on and incorporate all the patentable subject matter of independent claim 1. Claims 21-24 and 31-37 depends on and incorporate all the patentable subject matter of independent claim 20. Thus, Araujo fails to detract from the patentability of these dependent claims. Accordingly, Applicant submits that claims 2-6, 11, 12, 15, 16, 18, 21-24 and 31-37 are also patentable and in condition for allowance.

Therefore, Applicant respectfully requests that the Examiner withdraw the rejection of claims 1-6, 11, 12, 15, 16, 18, 20-24 and 31-37 under 35 U.S.C. §102.

B. Claims 38, 44 and 51-54 Patentably Distinguished over Araujo

Claim 38 is directed to an apparatus, claim 51 is directed to a system, claims 44 and 52 are directed to methods, and claims 53 and 54 are directed to articles of manufacture. Claims 38, 44 and 51-54 recite static image data representative of at least a portion of the screen of graphical display output. Claim 51 recites static image data representing the screen of graphical display output. Claims 52 and 53 recite static image data representing at least a portion of the screen of produced graphical user interface data. Araujo fails to disclose this element of the claimed invention.

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. Araujo does not disclose static image data representative of the screen of graphical display output, or representing at least a portion of the screen of graphical display output, or representing at least a portion of the screen of produced graphical user interface data. The Examiner cites a section in Araujo (paragraph [0117]) that describes modules accepting output data, such as screen shots, from an application program and converting the data from RDP form into graphical HTML pages in a secure HTTP response for transmission to a user browser. Araujo (paragraphs [0126] and [0138]) further describes the retrieval of a HTML template page from a set of stored pages based on the nature of a user request and the data requested, for transmission to a user browser. Since the graphical HTML pages are derived from templates within the SEP, they are not equivalent to static image data representative of graphical display output derived from the application on the application server. Moreover, the graphical HTML pages are configured for user interaction instead of being

static displays – the HTML is user interface commands and not static image data. Therefore, Araujo fails to disclose each and every feature of the claimed invention.

For at least the above-discussed reasons, Araujo fails to disclose each and every feature of independent claims 38, 44 and 51-54. Thus, Applicant submits that claims 38, 44 and 51-54 are patentable and in condition for allowance. Claims 39-43 depend on and incorporate all the patentable subject matter of independent claim 38. Claims 45-47 depend on and incorporate all the patentable subject matter of independent claim 44. Thus, Araujo fails to detract from the patentability of these dependent claims. Accordingly, Applicant submits that claims 39-43 and 45-47 are also patentable and in condition for allowance. Therefore, Applicant respectfully requests that the Examiner withdraw the rejection of claims 38-47 and 51-54 under 35 U.S.C. §102.

CLAIM REJECTIONS UNDER 35 U.S.C. §103

V. Dependent claims 7, 8, 13, 14, 19, 25, 28-30 and 48-50 Rejected Under 35 U.S.C. §103

Dependent claims 7, 8, 13, 14, 19, 25, 28-30 and 48-50 are rejected under 35 U.S.C. §103(a) as unpatentable over Araujo, and further in view of U.S. Pub. No. 2002/0091738 to Rohrabough et al. (“Rohrabough”). Dependent claims 9, 10, 26 and 27 are rejected under 35 U.S.C. §103(a) as unpatentable over Araujo-Rohrabough, and further in view of U.S. Pub. No. 2003/0055327 to Shaw et al. (“Shaw”). Dependent claims 17 is rejected under 35 U.S.C. §103(a) as unpatentable over Araujo, and further in view of U.S. Pub. No. 2003/0041110 to Wenocur et al. (“Wenocur”). Claims 7, 8, 13, 14 and 19 depend on and incorporate all the patentable subject matter of independent claim 1. Claims 25 and 28-30 depend on and incorporate all the patentable subject matter of independent claim 20. Claims 48-50 depend on

and incorporate all the patentable subject matter of independent claim 44. Applicant respectfully traverses this rejection and submits that Araujo in view of Brand, Rohrabough and Wenocur, alone or in combination, fails to teach or suggest each and every element recited in claims 7, 8, 13, 14, 19, 25, 28-30 and 48-50.

A. Claims Dependent from Patentable Independent Claims 1, 20 and 44

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. For the reasons discussed above in connection with the rejection of the independent claims 1, 20 and 44, Applicant submits independent claims 1, 20 and 44 are patentable and in condition for allowance. Thus, the following claims dependent from claims 1, 20 and 44 are patentable and in condition for allowance: 7, 8, 13, 14, 19, 25, 28-30 and 48-50. As with Araujo, Brand, Rohrabough and Wenocur do not disclose, teach or suggest transmitting or receiving static image data representing the screen of graphical display output or representing at least a portion of the screen of produced graphical user interface data. Because, Araujo in view of Brand, Rohrabough and Wenocur, alone or in combination, fail to detract from the patentability of the claimed invention, Applicant submits dependent claims 7, 8, 13, 14, 19, 25, 28-30 and 48-50 are patentable and in condition for allowance. Accordingly, Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claims 7, 8, 13, 14, 19, 25, 28-30 and 48-50 under 35 U.S.C. §103.

CONCLUSION

In light of the aforementioned amendments and arguments, Applicant contends that each of the Examiners rejections has been adequately addressed and all of the pending claims are in condition for allowance. Accordingly, Applicant respectfully requests reconsideration, withdrawal of all grounds of rejection, and allowance of all of the pending claims.

Should the Examiner feel that a telephone conference with Applicant's attorney would expedite prosecution of this application, the Examiner is urged to contact the Applicant's attorney at the telephone number identified below.

Respectfully submitted,

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Dated: July 3, 2008

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